



UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

**ZEITZ & STEIN, L.L.C.**  
ROBIN LONDON-ZEITZ, ESQUIRE (RZ 2933)  
201 Barclay Pavilion West  
Cherry Hill, NJ 08034  
(856) 857-1222  
*Attorneys for Creditor,*  
*CRUSADER LIEN SERVICES*

In Re:

THOMAS ABRAHAM

Case No.: 05-47716/RTL

Hearing Date: July 28, 2009 at 9:00AM

Judge: Raymond T. Lyons

**ORDER**

The relief set forth on the following page, numbered two (2) through three (3) is hereby **ORDERED**.

**DATED: 8/20/2009**

  
Honorable Judge Raymond T. Lyons  
United States Bankruptcy Judge

THIS MATTER having come before the Court upon the motion of Crusader Lien Services ("Creditor") requesting the entry of an Order for relief from the automatic stay to proceed with a foreclosure proceeding against Thomas Abraham (the "Debtors"), and the following appearances having been entered, Robin London-Zeitz, Esquire, Zeitz & Stein, L.L.C. attorneys for Creditor and Patrick Moscatello, Esquire, attorney for the Debtors; and

IT APPEARING that Creditor is the holder of certain tax lien(s) (the "Tax Lien") secured by the Debtors' real estate located at 25 Airsdale Avenue, Long Branch, New Jersey, Block 453, Lot 20 (the "Property"); and

IT FURTHER APPEARING that Creditor filed a motion (the "Motion") for relief from the automatic stay to foreclose the Tax Lien; and

IT FURTHER APPEARING that the Debtors now seek to pay the amounts owed to Creditor through their Chapter 13 plan; and the parties having agreed to the form and entry of this Order,

IT IS ORDERED as follows:

1. Creditor shall file a proof of claim by September 24, 2009, which claim shall be deemed a timely filed allowed claim pursuant to the bankruptcy code and rules. Creditor's claim shall be paid by the Debtor over the remaining months of the Debtor's Chapter 13 Plan.
2. Within thirty (30) days of the entry of this Order, the Debtors shall pay all outstanding post-petition taxes owing to City of Long Branch on account of the Property except to the extent that Creditor has already paid said post-petition taxes.
3. In the event the Debtors fail to make to make any of the post-petition payments required to be made to City of Long Branch on account of the Property or fails to make any

payments under their Chapter 13 plan, within thirty (30) days of their due date, then Creditor shall be entitled to relief from the automatic stay pursuant to 11 U.S.C. §362(d). Said relief shall be granted upon application of Creditor, with seven (7) days notice to the Debtors and Debtors' counsel, setting forth the default in question.

4. Creditor is granted an administrative claim, which will be paid through the Debtors' Chapter 13 plan, in the amount of \$500.00 on account of the legal fees and costs incurred in the prosecution of its relief from stay motion.